



March 18, 2019

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: VRS Access Technology Reference Platform and RUE Profile (CG Docket Nos. 10-51 & 03-123)

Dear Ms. Dortch,

On March 14, 2019, representatives of ASL Services Holdings, LLC dba GlobalVRS (“GlobalVRS”); CSDVRS, LLC dba ZVRS (“ZVRS”); Convo Communications, LLC; Purple Communications, Inc.; and Sorenson Communications, LLC (collectively the “Joint VRS Providers” or “Providers”) met with Commission staff to discuss the RUE Profile and VATRP App. Commission staff included Patrick Webre, Chief of the Consumer and Governmental Affairs Bureau; Robert Aldrich, Eliot Greenwald, and Michael Scott of the Consumer and Governmental Affairs Bureau; Eric Burger, Chief Technology Officer; and Andrew Multz of the Office of Managing Director. The Joint VRS Provider attendees were Gabrielle Joseph (by telephone) of GlobalVRS; Jeff Rosen of Convo; Zarko Roganovic and John Martin (both by telephone) of Purple; Michael Maddix and Isaac Roach (by telephone) of Sorenson; Julie Veach, Harris Wiltshire & Grannis LLP, counsel to Sorenson; and Greg Hlibok of ZVRS.

The Joint VRS Providers discussed their pending petition to suspend the upcoming April 29, 2019 deadline for all providers to be fully compliant with the RUE Profile and interoperable with the VRS Access Technology Reference Platform, or VATRP.¹ The Providers urged the Commission to suspend the April 29 implementation deadline. As a practical matter, it is not possible for any of the Providers to implement the RUE Profile by April 29. As the record in this proceeding reflects, the Providers need one year to implement the RUE Profile and be

¹ Petition of ASL Services Holdings, LLC dba GlobalVRS, CSDVRS, LLC dba ZVRS, Convo Communications, LLC, Purple Communications, Inc., and Sorenson Communications, LLC for Suspension of the RUE Profile and Video Access Technology Reference Platform Implementation Deadline, CG Docket Nos. 10-51 & 03-123 (filed Feb. 8, 2019).

interoperable with the VATRP after it is finalized.² The RUE Profile is not finalized, though. The Providers understand that the Commission staff have a copy for review, but before it can be finalized and become a requirement, the Bureau must put it out for comment, craft an order adopting a final version, and establish an implementation plan.³ With only six weeks until the implementation deadline, it is not possible to complete the necessary procedural steps, make any necessary changes to the RUE Profile, adopt an order and implementation plan, and afford adequate time for provider implementation. The deadline is simply no longer viable. But rather than attempt at this point to establish a new one, the Providers urge the Bureau to suspend the deadline pending further clarity on the status of the RUE Profile and VATRP.

The Providers also described their success in addressing prior interoperability issues. In twice-yearly conferences—one in-person and one virtual—the Providers (and MITRE) convene to test all their endpoints against each other to confirm that they interoperate. (The next conference will take place in-person in Salt Lake City from April 8-11, 2019.) The Providers also participate in biweekly calls, at which they work to *prevent* interoperability problems by coordinating efforts and discussing upcoming changes. MITRE, as the National Test Lab, also regularly tests providers' endpoints for interoperability and provides the results to the Commission. This robust and collaborative process works, and interoperability is very high.

Having addressed the interoperability problems that motivated the Commission to begin the RUE Profile/VATRP project in 2013, the VRS Providers are turning their attention and resources to the next generation of VRS improvements. For example, last October, the Consumer Groups identified the lack of encrypted video as a concern for VRS consumers in a letter to the Commission.⁴ The Providers have been working on an update to the VRS Provider Interoperability Profile (or "SIP Profile") to add VRS improvements including a method to encrypt video *while remaining fully interoperable*. The Providers have arranged for an expert in the SIP Profile to prepare a draft of an updated version, which the Providers look forward to reviewing and discussing as part of their regular calls and conferences. Once the Providers have reached consensus on a draft, they will submit the updated SIP Profile to the SIP Forum for review and publication.

The RUE Profile and VATRP project consumes resources that should be put toward tangible improvements in VRS service. The effort is taking money from the Fund and consuming provider resources that could be focused instead on developing then implementing encryption, skills-based routing, use of certified Deaf interpreters, and other advances in VRS.

² See *id.* at 8 & n.18.

³ See *id.* at 5-7.

⁴ See Letter from Claude L. Stout, Telecommunications for the Deaf and Hard of Hearing, Inc., Howard Rosenblum and Zainab Alkebsi, National Association of the Deaf, Mark Hill, Cerebral Palsy and Deaf Organization, Nancy B. Rarus and Alfred Sonnenstrahl, Deaf Seniors of America, Christian Vogler, Rehabilitation Engineering Research Center on Technology for the Deaf and Hard of Hearing, Gallaudet University, CG Docket Nos. 03-123 & 10-51, at 2-4 (filed Oct. 31, 2018).

Ms. Marlene H. Dortch

March 18, 2019

Page 3 of 3

The Providers urge the Commission first to suspend the implementation deadline, and then to re-evaluate the need for the RUE Profile and VATRP in light of the improvements in interoperability since 2013.

Respectfully submitted,

/s/

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ASL SERVICES HOLDINGS, LLC
DBA GLOBALVRS

/s/

Jeff Rosen
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CONVO COMMUNICATIONS, LLC

/s/

Michael Maddix
Director, Government and Regulatory Affairs
SORENSEN COMMUNICATIONS, LLC

/s/

Gregory Hlibok
Chief Legal Officer
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Parent Company of CSDVRS, LLC
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cc: Patrick Webre
Eric Burger
Robert Aldrich
Eliot Greenwald
Michael Scott
Andrew Mulitz